

March 19, 1971

Mr. Donald K. Espe
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Minneapolis, Minnesota 55402

This is in reply to your letter concerning your request for interpretations several Sections of 49 CFR, Part 192.

Your questions and our replies Follows:

Question: Paragraph 192.63: Our practice is to salvage large size pipe and fittings when they have been exposed by other construction (sewer, water, bridge, grade change,etc) and relocation will be necessary. Pipe is cleaned, inspected and re-coated internally and externally. Fittings are cleaned, inspected and ends are re-finished. We then normally return the pipe and fittings to the same type of service that it originally served. Is it permissible to salvage pipe and fittings when the original markings or purchase specifications are not available?

Answer: Section 192.63 applies only prospectively, that is, to items manufactured after the effective date of the regulations, November 10,1970. It therefore, does not apply to the use salvaged pipe or fittings meeting other safety standards. If the pipe is qualified for the intended service under Section 192.107 (yield(s) for steel pipe), and Section 192.109 (nominal wall thickness(t) for reused only to the degree that their specifications can be verified to meet the requirements of Subpart D, Design of pipeline Components.

Question: Paragraph 192.355: We are concerned about the concept of making the utility responsible for any action or installation by the customer. We objected to this in the initial call for comments and feel it deserves additional consideration. Mrs. Goldman stated her desire to make the utility responsible for everything, including the appliances, but you added that the present law is only intended to include the meter outlet. It is impossible for any gas distribution company to monitor all the equipment and appliances a customer might install. When we are aware of any questionable installations we will notify the local plumbing inspector and the customer. The responsibility in this area belongs in the municipal plumbing and heating ordinances.

Answer: 49 CFR, Section 192.3 of the Minimum Federal Safety Standards defines a service line as a distribution line that transports gas to a customer meter set assembly from a common source of supply. Section 192.355 imposes additional requirements for the meter itself. We further

contend, as Mrs/ Goldman stated, that the burden is on the operator to ascertain the safe condition of the customer's service lines to which gas is delivered.

Question: Paragraph 192.363: The question of what is a "specialized tool" was brought up in the Kansas City meeting and we request a waiver on this section pending further investigation. To our knowledge there are no tamper-proof cocks made in larger than 2" size. Our original comments on this section asked that this requirement apply only to residential services. Mrs. Goldman stated the reasoning behind the rule was to prevent acts of sabotage or destruction. On 2" and larger services it would be faster to use a hacksaw, or pipe cutter, or even a sledge hammer than to attempt to dismantle a plug valve and remove the core. Our company has no history of trouble caused by the willful removal of a valve core on a 2" or larger commercial or industrial service.

Answer: Section 192.363(c) was taken directly from the ANSI B31.8 Code (1968 edition). We are aware that tamperlocking device or placement of the valve within a locked enclosure would in our interpretation, fully meet the requirements of this section. After considering this interpretation, if you still wish to request a waiver you may do so by formally submitting your request with appropriate justification.

Question: Paragraph 192.513: Why have the test requirements for plastic services been made more extreme than the B31.8 Code requested? In Kansas City you stated that the test requirements were the same as they had been under the B31.8 Code. This is not so. The B31.8 Code (Paragraph 849.152(b)) required that plastic service lines operating between 40 psi and 100 psi to be tested to the maximum operating pressure or 100 psi whichever is the lessor. We have tested thousands and thousands of plastic services at 100 psi with excellent results. Increasing the test pressure to 150% of operating pressure would mean that the present standard air compressors in general use would not be adequate. We request a waiver on this section pending further study.

Answer: The ANSI B31.8 Code required a test pressure of 1.5 x the MOP for plastic pipeline and mains (842.52(b)) or a minimum of 50 psi. The B31.8 Code also permitted a test pressure for plastic service lines of only the proposed operating pressure or 100 psi whichever is less for service lines operating in excess of 40 psi (849.152(b)). The Office of Pipeline Safety did not feel we would be justified from a safety point of view to permit a lesser test on plastic service lines compared to other plastic pipelines particularly since the construction requirements for plastic were not near as extensive as for steel (welding specifications, qualifications of welders, material specifications, length of experience, etc.)

After considering this interpretation, if you still wish to request a waiver you may do so by formally submitting your request with appropriate justification.

Question: Paragraph 192.619: When this section is considered in conjunction with Paragraph 192.511 we get a very unusual testing chart for steel services:

Operating Pressure	0 psi to 1 psi = 150% test
Operating Pressure	1 psi to 34 psi = 50 psi test
Operating Pressure	34 psi to 40 psi = 150% test
Operating Pressure	40 psi to 60 psi = 90 psi test
Operating Pressure	60 psi to 20% SMYS = 150% test

It seems this has been made particularly cumbersome without any safety advantages. In our discussion #4 we pointed out our fine safety record using 100 psi testing for all services operating at 100 psi or less. We urge that this same criteria be adapted and that we be granted a waiver on these sections as presently written.

Answer: The spot amendment to §192.619(a)(2)(ii) in part corrected this problem. We are also considering some clarifying changes to the testing and MAOP requirements that will go through the rulemaking process.

The 50 psi test level and the 90 psi test level as specified in the existing regulation were so specified to ease the burden of the operator in the 100 psi or less operating range and still provide an adequate safety level. It was our opinion that this would take care of most of the operator's testing problems. For facilities operating over 100 psi it is our opinion that the test level should be the specified amount over the desired MOP in order to provide an adequate and uniform level of safety.

After considering this interpretation, if you still wish to request a waiver you may do so by formally submitting your request with appropriate justification.

Question: Paragraph 192.725: Do you consider this section to be applicable when a service is temporarily cut out of the way for other construction (sewer, water, ect)? It has been our company's feeling that it is better and safer to remove the conflicting section of gas service and replace it after the other installation is completed and the backfilling is nearly completed. The idea has been to prevent possible unknown damage to the gas system. It now appears that your new regulation will reward the company that allows other construction to work around live gas facilities. If this section is intended to apply only to lines taken out of service for more than one day or to lines that have been damaged we would have no objection. We also see no value in maintaining continuous service through a by-pass as a safety factor. That same fittings and material will be used for the re-connection regardless of continuous service or not. We ask that this section be re-evaluated also.

Answer: Section 192.725 imposes the same requirements as those in the ANSI B31.8 Code (1968 edition), paragraph 853.4 and was also part of the interim minimum Federal standards, and

we have no reason to believe it is not a valid safety requirement. If you have such evidence and wish to submit it to this Office, we will consider the possibility of further rulemaking action to amend this section.

If we can be of further assistance, do not hesitate to call in us.

Sincerely,

/signed/

Joseph C. Caldwell
Director,
Acting Office of Pipeline Safety